

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

STANLEY LEE BROWN, JR., et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action: 6:24cv00039
)	
THE CITY OF LYNCHBURG, et al.,)	
)	
Defendants.)	

ANSWER

Defendant, City of Lynchburg, by counsel, answers the Amended Complaint as follows:

1. With regard to paragraphs 1-4, Defendant admits that jurisdiction and venue is correct in the Lynchburg Division of the United States District Court for the Western District of Virginia. Defendant denies that this Court has jurisdiction over the state law claims standing alone.

2. Defendant lacks knowledge or information sufficient to admit or deny the allegations contained in paragraphs 5-6.

3. Defendant admits the allegations contained in paragraphs 7-11.

4. Defendant lacks knowledge or information sufficient to admit or deny the allegations contained in paragraphs 12-13.

5. Paragraphs 14-77 contain allegations that do not pertain to Defendant and therefore it is not required to respond to those allegations.

6. With regard to the allegations contained in paragraphs 78-79, Defendant affirmatively states that it maintains and upholds constitutional policies regarding detention and

invasive searches in custom and in practice. Defendant denies the allegations contained in paragraphs 78-79.

7. Paragraphs 80-124 contain allegations that do not pertain to Defendant and therefore it is not required to respond to those allegations.

8. In response to paragraph 125, Defendant incorporates its responses to the preceding paragraphs.

9. Defendant admits the allegation contained in paragraph 126.

10. Defendant denies the allegations contained in paragraphs 127-132.

11. Paragraphs 133-176 contain allegations that do not pertain to Defendant and therefore it is not required to respond to those allegations.

12. In response to paragraph 177, Defendant incorporates its responses to the preceding paragraphs.

13. Defendant admits the allegation contained in paragraph 178.

14. Defendant denies the allegations contained in paragraphs 179-184.

15. In response to paragraph 185, Defendant incorporates its responses to the preceding paragraphs.

16. Defendant denies the allegations contained in paragraph 186.

17. Paragraphs 187-188 contain allegations that do not pertain to Defendant and therefore it is not required to respond to those allegations.

18. Defendant denies all allegations not expressly admitted herein.

19. Defendant denies that it is indebted or liable to the Plaintiffs for the amounts or reasons set forth in the Amended Complaint or any other amounts or reasons whatsoever.

20. Defendant is immune from suit or damages by the doctrines of sovereign, governmental, and/or qualified immunity.

CITY OF LYNCHBURG

By: /s/ John R. Fitzgerald

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of February, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to:

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